

BakerHostetler

Baker & Hostetler LLP

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William R. Daugherty
direct dial: 713.646.1321
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November 16, 2018

**Via Overnight Mail
and E-mail (ocpdatabreach@mt.gov)**

Office of the Attorney General
Attn: Office of Consumer Protection
555 Fuller Avenue
Helena, MT 59601

Re: Incident Notification

Dear Sir or Madam:

On behalf of our client, LPL Financial LLC (LPL), we are writing to notify you of a data security incident that occurred at an LPL third-party service provider, Capital Forensics, Inc. (CFI).

CFI is a firm that provides consulting and data analysis to assist firms with regulatory, compliance, and risk management activities. On November 1, 2018, LPL was notified by CFI that, on the same day, an unauthorized person appears to have accessed a single CFI user's account at a third party file-sharing system that CFI uses to share data with its customers, including LPL. CFI reported that it promptly secured the CFI user's account the same day but that files containing LPL client information were among the data potentially accessed. Upon learning this, LPL immediately launched an investigation and coordinated with CFI to ensure that the LPL data, including client information, was removed from that file-sharing system. Working with CFI, LPL conducted a thorough review of the files and determined that the files included some of LPL's clients' personal information, which varied by individual but could have included the client's name, LPL account number, and Social Security number.

Beginning on November 17, 2018, LPL will start mailing notification letters to 748 Montana residents in accordance with Mont. Code Ann. § 30-14-1704 in substantially the same form as the attached letter. LPL has provided a telephone number that individuals can call with questions. LPL has also arranged for individuals to receive two years of complimentary credit monitoring and identity protection services from AllClear ID.

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Protecting investor information is a top priority for LPL, and LPL has implemented heightened monitoring on the LPL accounts involved. Law enforcement has also been notified of the incident.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "William R. Daugherty". The signature is fluid and cursive, with the first name "William" and last name "Daugherty" clearly distinguishable.

William R. Daugherty
Partner

Enclosure

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November 29, 2018

**Via Overnight Mail
and E-mail (ocpdatabreach@mt.gov)**

Office of the Attorney General
Attn: Office of Consumer Protection
555 Fuller Avenue
Helena, MT 59601

Re: Supplemental Incident Notification

Dear Sir or Madam:

On behalf of our client, LPL Financial LLC (LPL), we are writing to provide an update to the notice sent to your office on November 16, 2018, regarding a data security incident that occurred at an LPL third-party service provider, Capital Forensics, Inc. (CFI).

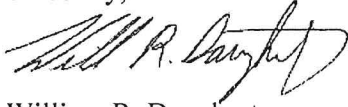
As noted in our prior notice, on November 17, 2018, LPL began mailing notification letters to 748 Montana residents. Since then, LPL has continued to work diligently to identify mailing addresses for additional individuals whose information was contained in the potentially accessed data files on the third-party system that CFI uses and has also worked with the third-party mailing vendor to process the remaining notification lists for mailing, which occurred in phases to facilitate expeditious notifications. LPL received the state-by-state count of individuals who were mailed letters from November 21, 2018 through November 28, 2018, which included notification letters mailed to an additional 21 Montana residents in accordance with Mont. Code Ann. § 30-14-1704 in substantially the same form as the previously enclosed letter. LPL has provided a telephone number that individuals can call with questions. LPL has also arranged for individuals to receive two years of complimentary credit monitoring and identity protection services from AllClear ID.

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Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC

November 29, 2018
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Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "William R. Daugherty". The signature is stylized with a large, sweeping initial "W" and a long, horizontal stroke extending to the right.

William R. Daugherty
Partner

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January 22, 2019

**Via Overnight Mail
and E-mail (ocpdatabreach@mt.gov)**

Office of the Attorney General
Attn: Office of Consumer Protection
555 Fuller Avenue
Helena, MT 59601

Re: Supplemental Incident Notification

Dear Sir or Madam:

On behalf of our client, LPL Financial LLC (LPL), we are writing to provide an update to the notice sent to your office on November 16, 2018, regarding a data security incident that occurred at an LPL third-party service provider, Capital Forensics, Inc. (CFI).

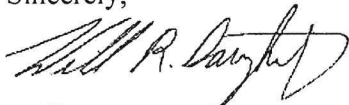
As noted in our prior letter, on November 17, 2018, LPL began mailing notification letters to 748 Montana residents. LPL also arranged for individuals to receive two years of complimentary credit monitoring and identity protection services from AllClear ID and established a dedicated call center that individuals can call with questions. Thereafter, LPL continued to work diligently to identify mailing addresses for additional individuals whose information was contained in the data files involved. LPL worked with a mailing vendor to process the additional notification lists for mailing, which occurred in phases to facilitate expeditious notifications. Additional notice letters were mailed from November 21, 2018 through November 28, 2018. In connection with these mailings, the mailing vendor provided LPL with a list of individuals whose addresses were determined to be undeliverable. LPL then worked to obtain updated address information and/or correct the address information, and letters to these individuals, including 8 Montana residents, will be mailed beginning on January 17, 2019.

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Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC

January 22, 2019
Page 2

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

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William R. Daugherty
Partner